## IN THE UNITED STATES DISTRICT COURT IN AND FOR THE DISTRICT OF DELAWARE

HELEN D. MARTIN, Pro se Plaintiff v. C.A. No.: 06-303 (GMS) PACHULSKI, STANG, ZIEHL, YOUNG & JONES, P.C., Defendant

## **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Defendant, through its undersigned counsel, respectfully moves for Summary Judgment on all counts of the Complaint of Plaintiff Helen D. Martin. The grounds for this Motion are set forth in the Opening Brief in Support of Defendant's Motion for Summary Judgment, which is filed separately.

Respectfully submitted,

Dated: August 30, 2007 /s/ Richard R. Wier, Jr.

Richard R. Wier, Jr. (#716) Michele D. Allen (#4359) Two Mill Road, Suite 200 Wilmington, DE 19806 Rwier@wierlaw.com 302.888.3222 Attorney for Defendant

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

HELEN D. MARTIN, <u>Pro se</u> Plaintiff	§ § §	
v.	§ §	C.A. No.: 06-303 (GMS)
PACHULSKI, STANG, ZIEHL, YOUNG & JONES, P.C., Defendant	\$ \$ \$ \$	

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of August 2007, that I served Plaintiff, Helen D.

Martin with Defendant's, Motion For Summary Judgment by U.S. MAIL on:

Helen D. Martin, *pro se* 3 East 24<sup>th</sup> Street Wilmington, Delaware 19802

RICHARD R. WIER, JR., P.A.

/s/ Richard R. Wier Richard R. Wier, Jr. (#716) Michele D. Allen (#4359) Two Mill Road, Suite 200 Wilmington, DE 19806 (302)888-3222